To: Rik Lantz[rlantz@scst.com]; Berkoff, Michael[berkoff.michael@epa.gov]; Sathya

Yalvigi[Sathya.V.Yalvigi@chemours.com]; de las Fuentes, Sandra[Sandra.delasFuentes@parsons.com]

From: Palachek, Randy M Sent: Mon 2/1/2016 6:39:55 PM

Subject: Re: USS Lead - Weekly update 1/29/2016

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;;;;;;;; Rik

I don't understand the xrf issue. We have 2 situations where we have xrf values. 1. When below a screening value for required lab analysis and a no threat level. 2. Between cleanup number and tclp analysis. Hence we know area needs to be cleaned up. I don't think we should do any regression analysis as it is just another estimate at what value may be. I think we should just say these values are from xrf and either represent less than cleanup value or are above a cleanup value and yard will be remediated. My two cents is why try to estimate another value that doesn't change what we are doing. Just give them the avg xrf value of 3 samples. And say below cleanup or above cleanup.

As far as validation there is level 2 which is like a simple verification to a detailed level 4 validation to look at everything in depth.

Randy

On Jan 29, 2016, at 2:47 PM, Rik Lantz <<u>rlantz@scst.com</u>> wrote:

## USS Lead Weekly Update – 1/29/2016

The USS Lead project team continues to focus on office work to finish up what's been done so far. Here's where we stand on 1/29:

- 1. Vacating field office: We are emptying the office today and moving all of the tables, chairs, refrigerator, etc. into a Conex box provided by Chemours. We will need a new space with power, light, and heat when we resume sampling work in the spring, which is now about 8 weeks away.
- 2. Letters to residents: Letters reporting results to residents are held up right now by two issues that center on chemistry Discussions about what sort of XRF correction we ought to apply, and access to data validation reports from Chemours.

∀ XRF correction equation: For the XRF correction, we are working on determining what sort of regression we ought to use to derive an equation that corrects the raw results to what we believe the "true" concentration of the samples is. This involves both the error reported by the XRF instrument and how we deal with outliers in the resulting data set.

∀ Data validation reports: We need to review data validation reports so that we have confidence in the results that we report to the residents. In my simple schematization of the world of chemistry, there are two types of data: Data that has been validated and data that has not been validated. As it happens, there are lots of different levels of data validation, including the electronic version that simply checks holding times and other things that are easily verifiable by a computer, and multiple levels of increasing scrutiny by chemists. I believe that we are looking for some level between the simple electronic screening and an exhaustive review by PhD chemist types. We should discuss what we need and what Chemours is able to provide in our meeting on Monday.

- 3. Design document: The design document is hung up pending outcome of the above, because the XRF results and Chemours results are reported on the designs. Upon resolution of the data questions outlined above, we will submit a design document to EPA, which may be shared with Chemours.
- 4. Access agreements: We continue to pursue getting access from the recalcitrant property owners and from the railroads and NIPSCO. We are chipping away at the recalcitrant property owners, pulling in a few each week, and have a backlog of about 20 new properties that we can sample, and a backlog of 100+ individual properties that we have not yet gotten access to. We are unearthing considerable confusion on the RR side about who owns what. Elgin Joliet and Eastern RR was recently acquired by Canadian National, but Canadian National believes that some ROW parcels up near Chicago Avenue are owned by CSX. CSX disagrees, and the assessor's office isn't sure either, they say their info is out of date. No conceptual difficulties, just procedural ones, getting the different railroads to figure out who is responsible for the ROW next to the RR. We have a request in to sample the pipeline parcel, which is working its way through the bureaucratic labyrinth at NIPSCO.
- 5. Some sampling metrics: (Keep in mind that this is a moving target we are still waiting on results for some of the samples sent in December)

Total samples taken 3,133 < not including TCLP or Chemours

XRF only samples 2,346

EPA lab metals samples 777 Pb & As + 10 Pb only

Chemours lab samples 721 Pb, 925 As

EPA TCLP samples 246 TCLP Pb & As + 74 Pb only + 10 As only

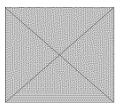
6. Fortnightly call: The next group fortnightly (every two weeks) call is scheduled for Monday 2/1 at 2:00 Central. If you have a particular issue you would like to discuss, please forward it to me.

Have a great weekend,

Thanks, Rik

## Rik Lantz, P.G., LEED-AP

Director of Environmental Services



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